

BRACEWELL

April 4, 2020

VIA ECF

Hon. Analisa Torres
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Morris Zukerman (16 Cr. 194)

Dear Judge Torres:

We write to request your assistance with Mr. Zukerman's release. As you know, your Order states that Mr. Zukerman is to be "released immediately to begin his term of home incarceration" and that he shall "self-quarantine[] for 14 days after release." (Order at 11.). The Bureau of Prisons, however, has taken the position that he must quarantine at Otisville for the next 14 days before being released. Mr. Zukerman's daughter is presently at Otisville with the intention of picking him up and transporting him (both would be wearing appropriate protective gear) to a residence where he would self-quarantine. Because we believe the Court's Order is clear and in Mr. Zukerman's best health interests, we ask the Court to direct BOP to follow it and release him to his daughter today.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman
Maggie Lynaugh

PS/ML:wr

cc: AUSA Stan Okula
AUSA Edward Imperatore

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